

NOV-30-2007(FRI) 02:22

LOMBARDI/INGBER LAW FIRM

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RAKOFF J
P. 002/003

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

GARY SCHAEFFER,

Plaintiff,

v.

LIGHTYEAR ENTERTAINMENT, LP.
ARNOLD HOLLAND, DON SPIELVOGEO
AND JOEL KAPLAN,

Defendants.

USDC SDNY
DOCUMENT
ELECTRONICALLY FILED
DOC #: 12-4-07
DATE FILED: 12-4-07

Civil Action No. 07 CV 9607 (JSR)

~~STIPULATION AND PROPOSED ORDER FOR EXTENSION OF TIME TO ANSWER OR MOVE~~

WHEREAS, Plaintiffs filed a summons and complaint (the "Summons and Complaint") on or about October 29, 2007 in this Court;

WHEREAS, Plaintiffs served on Defendants Lightyear Entertainment, LP on or about November 13, 2007 the Summons and Complaint;

WHEREAS, Defendants do not contest service of process of the Summons and Complaint on the individual defendants Arnold Holland, Don Spielvogel incorrectly named herein as Don Spielvogeo and Joel Kaplan;

WHEREAS, the parties to this action have agreed that a unified response date to the Summons and Complaint is desirable;

IT IS HEREBY STIPULATED AND AGREED THAT:

1. Defendants shall have until January 3, 2008 to respond to the Summons and Complaint.
2. Nothing herein shall be deemed to be an admission of liability on the part of Defendants.
3. Nothing herein shall be deemed a waiver of any applicable defense or objection to this action, with the exception that Defendants hereby waive any defense or objection based on inadequate or improper service of process.

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Dated: New York, New York
November 30, 2007

COWAN, DeBAETS, ABRAHAMS &
SHEPPARD LLP

By:

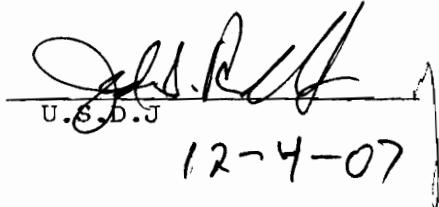

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Attorneys for Plaintiff
Gary Schaeffer

SO ORDERED:


U.S.D.J
12-4-07